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FILED
Los Angeles Superior Court

5 Attorneys for Plaintiffs
6 WANZI QU AND XIAOHONG FEI,
7 XIYONG WU AND MEINAN YIN

MAY 16 2012

John A. Clarke, Executive Officer/Clerk
By DOROTHY SWAIN, Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 WANZI QU AND XIAOHONG FEI,
10 (JOINTLY THE "QU PARENTS"),
11 XIYONG WU AND MEINAN YIN
12 (JOINTLY THE "WU PARENTS"),

Case No.:

BC484543

13 Plaintiffs,

14 vs.

15 UNIVERSITY OF SOUTHERN
16 CALIFORNIA, a corporation

17 Defendant.

18 COMPLAINT FOR DAMAGES:

19 **1ST CAUSE OF ACTION: WRONGFUL
DEATH BASED ON INTENTIONAL
MISREPRESENTATION AGAINST
DEFENDANT BY THE QU PARENTS**

20 **2ND CAUSE OF ACTION: WRONGFUL
DEATH BASED ON NEGLIGENT
MISREPRESENTATION AGAINST
DEFENDANT BY THE QU PARENTS**

21 **3RD CAUSE OF ACTION: WRONGFUL
DEATH BASED ON NEGLIGENCE
AGAINST DEFENDANT BY THE QU
PARENTS**

22 **4TH CAUSE OF ACTION: WRONGFUL
DEATH BASED ON INTENTIONAL
MISREPRESENTATION AGAINST
DEFENDANT BY THE WU PARENTS**

23 **5TH CAUSE OF ACTION: WRONGFUL
DEATH BASED ON NEGLIGENT
MISREPRESENTATION AGAINST
DEFENDANT BY THE WU PARENTS**

24 **6TH CAUSE OF ACTION: WRONGFUL
DEATH BASED ON NEGLIGENCE
AGAINST DEFENDANT BY THE WU
PARENTS**

25 CIV/CASE: BC484543 LEA/DEFN.
RECEIPT #: OCH11882037
26 DATE PAID: 05/16/12 05/16/12
27 PAYMENT: \$395.00 RECEIVED:
28 395.00 0310

1 **I. GENERAL ALLEGATIONS**

2 1. Plaintiffs, Mr. Wanzhi Qu and Mrs. Xiaohong Fei, are the father and mother of
3 Mr. Ming Qu, (hereinafter referred to as "Qu Parents").

4 2. Plaintiffs, Mr. Xiyong Wu and Mrs. Meian Yin, are the father and mother of Ms.
5 Ying Wu, (hereinafter referred to as "Wu Parents").

6 3. Defendant University of Southern California (hereinafter "USC") is a private
7 corporation and an institution of higher learning located in Los Angeles, California.

8 4. Mr. Ming Qu was an international student from China enrolled at USC's graduate
9 school at the time of his death.

10 5. Ms. Ying Wu was an international student from China enrolled at USC's graduate
11 school at the time of her death.

12 **II. 1ST CAUSE OF ACTION: WRONGFUL DEATH BASED ON INTENTIONAL
13 MISREPRESENTATION AGAINST DEFENDANT BY THE QU PARENTS**

14 6. Plaintiffs incorporate by reference each and every allegation contained in
15 paragraphs 1 through 5 as though set forth fully herein.

16 7. USC actively solicits international students particularly from China for its
17 graduate studies program for which it receives a substantial amount of money from tuition to
18 help fund the University.

19 8. USC maintains a website to actively promote the graduate school for interested
20 overseas applicants.

21 9. The only way international students can apply to USC to is by going to this
22 website. Ming Qu applied to USC through this website.

23 10. This website extolls the virtues of USC and among other things, has a specific
24 section, which lists the most common questions asked by prospective students. Ming Qu was a
25 prospective student.

26 11. Included in the list of most frequent questions asked was the following: "How
27 safe is USC?" The answer was: "USC is ranked among the safest of U.S. universities and
28 colleges, with one of the most comprehensive, proactive campus and community safety programs

1 in the nation." "USC Public Safety Officers provide 24-hr law enforcement services on the
2 University Park and Health Sciences campuses, as well as in surrounding neighborhoods."

3 12. USC is not one of the safest U.S. universities and colleges and does not provide
4 twenty four hour law enforcement services in the surrounding neighborhoods and is in a high
5 crime area.

6 13. In the neighborhood where Ming Qu was killed, USC provided no patrolling.

7 14. Ming Qu read and relied upon these representations and failures to disclose.

8 15. USC's website contains a section for housing. This website stated as follows:
9 "USC is located in a very urban neighborhood" instead of the fact that it is located in a high
10 crime residential neighborhood.

11 16. USC's website also stated that "the campus is located in a multiethnic residential
12 neighborhood. University Park is an urban oasis of courtyards and parks surrounding
13 Romanesque and contemporary-style campus buildings" instead of the fact that it is located in a
14 high crime residential neighborhood.

15 17. The "urban" representation misled Chinese students, including Ming Qu, into
16 believing the area is safe since in China, the more urban the area, the safer the area.

17 18. USC has offices in China and has large numbers of Chinese students and are well
18 aware how the word "urban" will be understood by prospective Chinese applicants.

19 19. USC knew that the surrounding neighborhood to USC is a high crime area and
20 never disclosed it to Ming Qu. USC continued to make these representations in an open letter
21 from USC to the community after the death of Ming Qu, stating that "...crime in our community
22 is low compared to other areas of Los Angeles..." This is clearly misleading as Los Angeles has
23 some of the worst crime areas.

24 20. USC knew that these representations were false and misleading.

25 21. USC made the above representations and failures to disclose in order to induce
26 international students including Ming Qu to go to USC.

27 22. USC knew that Chinese prospective students and students were very concerned
28 about the issue of safety because of their obligations to their parents. USC knew that the

1 Chinese students are a product of China's one child policy; that the child will be the primary and
2 in many cases, the only support for the parents when they become older. Ming Qu was such a
3 student.

4 23. Ming Qu was justified in relying on these representations and failures to disclose
5 because of the prestigious reputation of USC.

6 24. As a result of the misrepresentations and failures to disclose, Ming Qu became a
7 graduate student at USC and paid tuition.

8 25. It was in the surrounding area of the campus, within approximately a mile away
9 from the campus, that Ming Qu was shot and killed by an unknown assailant.

10 26. USC's representations and failures to disclose and that USC was in a high crime
11 area were substantial factors resulting in causing Ming Qu's harm.

12 27. If USC had not made the above representations and failures to disclose, Ming Qu
13 would have not gone to USC and would have not been killed; being in a high crime area was
14 not a risk that Ming Qu would have accepted.

15

16 **III. 2ND CAUSE OF ACTION: WRONGFUL DEATH BASED ON NEGLIGENT**
MISREPRESENTATION AGAINST DEFENDANT BY THE QU PARENTS

17 28. Plaintiffs incorporate by reference each and every allegation contained in
18 paragraphs 1 through 27 as though set forth fully herein.

19 29. USC actively solicits international students particularly from China for its
20 graduate studies program for which it receives a substantial amount of money from tuition to
21 help fund the University.

22 30. USC maintains a website to actively promote the graduate school for interested
23 overseas applicants.

24 31. The only way international students can apply to USC is by going to this website.
25 Ming Qu applied to USC through this website.

26 32. This website extolls the virtues of USC and among other things, has a specific
27 section, which lists the most common questions asked by prospective students. Ming Qu was a
28

1 prospective student.

2 33. Included in the list of most frequent questions asked was the following: "How
3 safe is USC?" The answer was: "USC is ranked among the safest of U.S. universities and
4 colleges, with one of the most comprehensive, proactive campus and community safety
5 programs in the nation." "USC Public Safety Officers provide 24-hr law enforcement services
6 on the University Park and Health Sciences campuses, as well as in surrounding
7 neighborhoods."

8 34. USC is not one of the safest U.S. universities and colleges and does not provide
9 twenty four hour law enforcement services in the surrounding neighborhoods and is in a high
10 crime area.

11 35. In the neighborhood where Ming Qu was killed, USC provided no patrolling.

12 36. Ming Qu read and relied upon these representations and failures to disclose.

13 37. USC's website contains a section for housing. This website stated as follows:
14 "USC is located in a very urban neighborhood" instead of the fact that it is located in a high
15 crime residential neighborhood.

16 38. USC's website also stated that "the campus is located in a multiethnic residential
17 neighborhood. University Park is an urban oasis of courtyards and parks surrounding
18 Romanesque and contemporary-style campus buildings."

19 39. The "urban" representation misled Chinese students, including Ming Qu, into
20 believing the area is safe since in China, the more urban the area, the safer the area.

21 40. USC has offices in China and has large numbers of Chinese students and are well
22 aware how the word "urban" will be understood by prospective Chinese applicants.

23 41. USC knew that the surrounding neighborhood to USC is a high crime area and
24 never disclosed it to Ming Qu. USC continued to make these representations in a letter from
25 USC after the death of Ming Qu, stating that "...crime in our community is low compared to
26 other areas of Los Angeles County..." This is clearly misleading as Los Angles has some of the
27 worst crime areas.

28 42. USC may have honestly believed that the representations were true. USC had no

1 reasonable grounds for believing the representations were true when it made them.

2 43. USC made the above representations and failures to disclose in order to induce
3 international students including Ming Qu to go to USC.

4 44. USC knew that Chinese prospective students and students were very concerned
5 about the issue of safety because of their obligations to their parents. USC knew that the
6 Chinese students are a product of China's one child policy; that the child will be the primary and
7 in many cases, the only support for the parents when they become older. Ming Qu was such a
8 student.

9 45. Ming Qu was justified in relying on these representations and failures to disclose
10 because of the prestigious reputation of USC.

11 46. As a result of the misrepresentations and failures to disclose, Ming Qu became a
12 graduate student at USC and paid tuition.

13 47. It was in the surrounding area of the campus, within approximately a mile away
14 from the campus, that Ming Qu was shot and killed by an unknown assailant.

15 48. USC's representations; and failures to disclose including and without limitation
16 that USC was in a high crime area were substantial factors resulting in causing Ming Qu's harm.

17 49. If USC had not made the above representations and failures to disclose, Ming Qu
18 would have not gone to USC and would have not been killed; being in a high crime area was
19 not a risk that Ming Qu would have accepted.

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21 **IV. 3RD CAUSE OF ACTION WRONGFUL DEATH BASED ON NEGLIGENCE
AGAINST DEFENDANT BY THE QU PARENTS**

22 50. Plaintiffs incorporate by reference each and every allegation contained in
23 paragraphs 1 through 49 as though set forth fully herein.

24 51. USC was negligent.

25 A. USC had a legal duty to its students including Ming Qu to use due care
26 and USC breached that duty.

27 1. Ming Qu was a graduate student at USC paying tuition.

1

2. USC had represented to students, including Ming Qu, that the area
3 surrounding the campus in which Ming Qu was killed was safe.

3

3. It was foreseeable by USC that the area surrounding the campus
4 was unsafe because it was in a high crime area.

4

4. It was foreseeable by USC that students including Ming Qu would
5 enter into the area because it was immediately adjacent to the
6 campus and many students traveled to and lived in this area.

5

5. It was foreseeable that harm might come to students in that area
6 because it was unsafe. Ming Qu was visiting Ying Wu who lived
7 in the area at the time that he was killed by an unknown assailant.

6

6. It was foreseeable that harm might come to students in the area,
7 including Ming Qu, if USC did not provide security in that area.
8 The adjacent area in which USC provided security was called the
9 “patrolled area.” The area in which Ming Qu was killed was
10 called “the quick response area.” The “patrolled area” helped
11 prevent crime in the area by, among other things, showing a police
12 presence, “security and license plate recognition cameras,
13 uniformed officers, and yellow jacketed security ambassadors.” A
14 “quick response” is only helpful after the crime has been
15 committed. There was no reason not to extend the same security
16 to the quick response area. The additional cost would have been
17 “de minimis” as the additional area consisted of a relatively few
18 number of additional blocks of housing. There was no visible
19 delineation between the two areas and the neighborhoods are
20 basically the same, have the same degree of crime and are both
21 unsafe to the same extent.

22

7. It was foreseeable to USC that if it had provided security in the
23 area in which Ming Qu was killed, that area would have been
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1 significantly safer. USC in an open letter after the death of Ming
2 Qu stated the killing "occurred outside the neighborhood areas
3 where over the past several years we have steadily increased our
4 security presence, adding dozens of security and license plate
5 recognition cameras, uniformed officers, and yellow-jacketed
6 security ambassadors." Further, it said that "These efforts, among
7 others, have succeeded in significantly improving safety in our
8 surrounding community." USC offered no explanation why it did
9 not provide any security in the area in which Ming Qu was killed.

10 8. USC exercised control over the area because it provided "quick
11 response" to students within the area in which Ming Qu was killed
12 and exercised control over the adjacent area.

13 9. USC admitted moral responsibility for the death of Ming Qu.

14 B. USC breached its duty of care to its students, including Ming Qu, by not
15 providing security; by not warning them it was in a high crime area; and by
16 misleading them into thinking it was safe to live and go into the area.

17 C. The breach of such duty was a legal or proximate cause of the harm to Ming Qu
18 because it was foreseeable that but for USC's breach, the harm to Ming Qu might
19 have been prevented.

20 52. Ming Qu was harmed when he was killed by an unknown assailant.

21 53. Defendant's negligence, as stated above, was a substantial factor in causing harm
22 to Ming Qu because if defendant had provided security to the area in which Ming Qu was killed,
23 it is likely he would not have been killed.

24

25 V. **4TH CAUSE OF ACTION: WRONGFUL DEATH BASED ON INTENTIONAL**
MISREPRESENTATION AGAINST DEFENDANT BY THE WU PARENTS

26 54. Plaintiffs incorporate by reference each and every allegation contained in
27 paragraphs 1 through 53 as though set forth fully herein.

1 55. USC actively solicits international students particularly from China for its
2 graduate studies program for which it receives a substantial amount of money from tuition to
3 help fund the University.

4 56. USC maintains a website to actively promote the graduate school for interested
5 overseas applicants.

6 57. The only way international students can apply to USC is by going to this website.
7 Ying Wu applied to USC through this website.

8 58. This website extolls the virtues of USC and among other things, has a specific
9 section, which lists the most common questions asked by prospective students. Ying Wu was a
10 prospective student.

11 59. Included in the list of most frequent questions asked was the following: "How
12 safe is USC?" The answer was: "USC is ranked among the safest of U.S. universities and
13 colleges, with one of the most comprehensive, proactive campus and community safety
14 programs in the nation." "USC Public Safety Officers provide 24-hr law enforcement services
15 on the University Park and Health Sciences campuses, as well as in surrounding
16 neighborhoods."

17 60. USC is not one of the safest U.S. universities and colleges and does not provide
18 twenty four hour law enforcement services in the surrounding neighborhoods and is in a high
19 crime area.

20 61. In the neighborhood where Ying Wu was killed, USC provided no patrolling.

21 62. Ying Wu read and relied upon these representations and failures to disclose.

22 63. USC's website contains a section for housing. This website stated as follows:
23 "USC is located in a very urban neighborhood" instead of the fact that it is located in a high
24 crime residential neighborhood.

25 64. USC's website also stated that "the campus is located in a multiethnic residential
26 neighborhood. University Park is an urban oasis of courtyards and parks surrounding
27 Romanesque and contemporary-style campus buildings" instead of the fact that it is located in a
28 high crime residential neighborhood.

1 65. The "urban" representation misled Chinese students, including Ying Wu into
2 believing the area is safe since in China, the more urban the area, the safer the area.

3 66. USC has offices in China and has large numbers of Chinese students and are well
4 aware how the word "urban" will be understood by prospective Chinese applicants.

5 67. USC knew that the surrounding neighborhood to USC is a high crime area and
6 never disclosed it to Ying Wu. USC continued to make these representations in an open letter
7 from USC to the community after the death of Ying Wu, stating that "...crime in our community
8 is low compared to other areas of Los Angeles..." This is clearly misleading as Los Angles has
9 some of the worst crime areas.

10 68. USC knew that these representations were false and misleading.

11 69. USC made the above representations and failures to disclose in order to induce
12 international students including Ying Wu to go to USC.

13 70. USC knew that Chinese prospective students and students were very concerned
14 about the issue of safety because of their obligations to their parents. USC knew that the
15 Chinese students are a product of China's one child policy; that the child will be the primary and
16 in many cases, the only support for the parents when they become older. Ying Wu was such a
17 student.

18 71. Ying Wu was justified in relying on these representations and failures to disclose
19 because of the prestigious reputation of USC.

20 72. As a result of the misrepresentations and failures to disclose, Ying Wu became a
21 graduate student at USC and paid tuition.

22 73. It was in the surrounding area of the campus, within approximately a mile away
23 from the campus, that Ying Wu was shot and killed by an unknown assailant.

24 74. USC's representations and failures to disclose and that USC was in a high crime
25 area were substantial factors resulting in causing Ying Wu's harm.

26 75. If USC had not made the above representations and failures to disclose, Ying Wu
27 would not have gone to USC and would not have been killed; being in a high crime area was
28 not a risk that Ying Wu would have accepted.

1 II. **5TH CAUSE OF ACTION: WRONGFUL DEATH BASED ON NEGLIGENT**
2 **MISREPRESENTATION AGAINST DEFENDANT BY THE WU PARENTS**

3 76. Plaintiffs incorporate by reference each and every allegation contained in
4 paragraphs 1 through 75 as though set forth fully herein.

5 77. USC actively solicits international students particularly from China for its
6 graduate studies program for which it receives a substantial amount of money from tuition to
7 help fund the University.

8 78. USC maintains a website to actively promote the graduate school for interested
9 overseas applicants.

10 79. The only way international students can apply to USC is by going to this website.
11 Ming Qu applied to USC through this website.

12 80. This website extolls the virtues of USC and among other things, has a specific
13 section, which lists the most common questions asked by prospective students. Ying Wu was a
14 prospective student.

15 81. Included in the list of most frequent questions asked was the following: "How
16 safe is USC?" The answer was: "USC is ranked among the safest of U.S. universities and
17 colleges, with one of the most comprehensive, proactive campus and community safety
18 programs in the nation." "USC Public Safety Officers provide 24-hr law enforcement services
19 on the University Park and Health Sciences campuses, as well as in surrounding
20 neighborhoods."

21 82. USC is not one of the safest U.S. universities and colleges and does not provide
22 twenty four hour law enforcement services in the surrounding neighborhoods and is in a high
23 crime area.

24 83. In the neighborhood where Ying Wu was killed, USC provided no patrolling.

25 84. Ying Wu read and relied upon these representations and failures to disclose.

26 85. USC's website contains a section for housing. This website stated as follows:
27 "USC is located in a very urban neighborhood" instead of the fact that it is located in a high
28 crime residential neighborhood.

1 86. USC's website also stated that "the campus is located in a multiethnic residential
2 neighborhood. University Park is an urban oasis of courtyards and parks surrounding
3 Romanesque and contemporary-style campus buildings."

4 87. The "urban" representation misled Chinese students, including Ying Wu, into
5 believing the area is safe since in China, the more urban the area, the safer the area.

6 88. USC has offices in China and has large numbers of Chinese students and are well
7 aware how the word "urban" will be understood by prospective Chinese applicants.

8 89. USC knew that the surrounding neighborhood to USC is a high crime area and
9 never disclosed it to Ying Wu. USC continued to make these representations in a letter from
10 USC after the death of Ying Wu, stating that "...crime in our community is low compared to
11 other areas of Los Angeles..." This is clearly misleading as Los Angles has some of the worst
12 crime areas.

13 90. USC may have honestly believed that the representations were true. USC had no
14 reasonable grounds for believing the representations were true when it made them.

15 91. USC made the above representations and failures to disclose in order to induce
16 international students including Ying Wu to go to USC.

17 92. USC knew that Chinese prospective students and students were very concerned
18 about the issue of safety because of their obligations to their parents. USC knew that the
19 Chinese students are a product of China's one child policy; that the child will be the primary and
20 in many cases, the only support for the parents when they become older. Ying Wu was such a
21 student.

22 93. Ying Wu was justified in relying on these representations and failures to disclose
23 because of the prestigious reputation of USC.

24 94. As a result of the misrepresentations and failures to disclose, Ying Wu became a
25 graduate student at USC and paid tuition.

26 95. It was in the surrounding area of the campus, within approximately a mile away
27 from the campus, that Ying Wu was shot and killed by an unknown assailant.

28 96. USC's representations; and failures to disclose including but without limitation

1 that USC was in a high crime area were substantial factors resulting in causing Ying Wu's harm.

2 97. If USC had not made the above representations and failures to disclose, Ying Wu
3 would not have gone to USC and would not have been killed; being in a high crime area was
4 not a risk that Ying Wu would have accepted.

5

6 **7 VII. 6TH CAUSE OF ACTION WRONGFUL DEATH BASED ON NEGLIGENCE
8 AGAINST DEFENDANT BY THE WU PARENTS**

9 98. Plaintiffs incorporate by reference each and every allegation contained in
10 paragraphs 1 through 97 as though set forth fully herein.

11 99. USC was negligent.

12 A. USC had a legal duty to its students including Ying Wu to use due care
13 and USC breached that duty.

14 1. Ying Wu was a graduate student at USC paying tuition.

15 2. USC had represented to students, including Ying Wu, that the area
16 surrounding the campus in which Ying Wu was killed was safe.

17 3. It was foreseeable by USC that the area surrounding the campus
18 was unsafe because it was in a high crime area.

19 4. It was foreseeable by USC that students including Ying Wu would
20 enter into the area because it was immediately adjacent to the
21 campus and many students traveled to and lived in this area.

22 5. It was foreseeable that harm might come to students in that area
23 because it was unsafe. Ying Wu lived in the area at the time that
24 she was killed by an unknown assailant.

25 6. It was foreseeable that harm might come to students in the area,
26 including Ying Wu, if USC did not provide security in that area.
27 The adjacent area in which USC provided security was called the
28 "patrolled area." The area in which Ying Wu was killed was
called "the quick response area." The "patrolled area" helped

1 prevent crime in the area by, among other things, showing a police
2 presence, "security and license plate recognition cameras,
3 uniformed officers, and yellow jacketed security ambassadors." A
4 "quick response" is only helpful after the crime has been
5 committed. There was no reason not to extend the same security
6 to the quick response area. The additional cost would have been
7 "de minimis" as the additional area consisted of a relatively few
8 number of additional blocks of housing. There was no visible
9 delineation between the two areas and the neighborhoods are
10 basically the same, have the same degree of crime and are both
11 unsafe to the same extent.

12 7. It was foreseeable to USC that if it had provided security in the
13 area in which Ying Wu was killed, that area would have been
14 significantly safer. USC in an open letter after the death of Ying
15 Wu stated the killing "occurred outside the neighborhood areas
16 where over the past several years we have steadily increased our
17 security presence, adding dozens of security and license plate
18 recognition cameras, uniformed officers, and yellow-jacketed
19 security ambassadors." Further, it said that "These efforts, among
20 others, have succeeded in significantly improving safety in our
21 surrounding community." USC offered no explanation why it did
22 not provide any security in the area in which Ying Wu was killed.

23 8. USC exercised control over the area because it provided "quick
24 response" to students within the area in which Ying Wu was
25 killed and exercised control over the adjacent area.

26 9. USC admitted moral responsibility for the death of Ying Wu.

27 B. USC breached its duty of care to its students, including Ying Wu, by not
28 providing security; by not warning them it was in a high crime area; and

1 by misleading them into thinking it was safe to live and go into the area.

2 C. The breach of such duty was a legal or proximate cause of the harm to
3 Ying Wu because it was foreseeable that but for USC's breach, the harm
4 to Ying Wu might have been prevented.

5 100. Ying Wu was harmed when she was killed by an unknown assailant.

6 101. Defendant's negligence, as stated above, was a substantial factor in causing harm
7 to Ying Wu because if defendant had provided security to the area in which Ying Wu was
8 killed, it is likely she would not have been killed.

9
10 WHEREFORE, Plaintiffs pray for judgment against Defendant as follows:

11 a. Direct pecuniary loss;
12 b. Loss of services, advice or training;
13 c. Loss of love, companionship, comfort, affection, society, solace or moral
14 support;
15 d. For attorney's fees and costs;
16 e. For such other and further relief as the Court deems just.

17
18 DATED: May 16, 2012

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20 ALAN BURTON NEWMAN, PLC

21 By: _____
22 Alan Burton Newman, Esq.
23 Sigal Shoghi, Esq.
24 Attorneys for Plaintiff
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